

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X Docket No.: 22-cv-05212(JPC)(JW)  
ROBERT W. GORDON,

Plaintiff,

-against-

WILSON ELSER MOSKOWITZ EDELMAN &  
DICKER LLP, RORY L. LUBIN, STUART MILLER,  
and JOHN and JANE DOE (said names being fictitious,  
the persons intended being those who aided and abetted  
the unlawful conduct of the named Defendants),

Defendants.

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**DECLARATION OF SAMUEL O. MADUEGBUNA IN OPPOSITION  
TO DEFENDANTS' MOTION TO COMPEL ARBITRATION  
AND DISMISS THE COMPLAINT**

SAMUEL O. MADUEGBUNA, hereby declares as follows:

1. I am member of the firm of Maduegbuna Cooper LLP, attorneys for Robert W. Gordon, the plaintiff in this matter.
2. I am an attorney at law duly admitted to practice before this court.
3. This declaration is submitted together with Plaintiff's memorandum of law in opposition to Defendants' motion to compel arbitration and dismiss the Complaint.
4. Attached hereto as Exhibit 1 is a copy of the Of Counsel Agreement, dated as of August 10, 2016.
5. Attached hereto as Exhibit 2 are the American Arbitration Association's Employment Arbitration Rules and Mediation Procedures, revised on October 1, 2017.
6. Attached hereto as Exhibit 3 is Plaintiff's Equal Employment Opportunity

Commission Charge of Discrimination, dated June 21, 2022.

I declare under the penalties of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed: New York, New York  
October 5, 2022

  

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SAMUEL O. MADUEGBUNA